

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

George D. McCarley
Plaintiff

v.

Household Finance Corporation III
Defendant

2007 NOV -8 A 10:18 Civil Action No. 3:06-CV-0091-MEF
Lead Case¹

RESPONSE TO COURT ORDER OF DOC # 96-1

Pursuant to Court order contained in DOC # 96-1, Plaintiff provides the following reply.

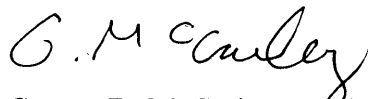
1. Plaintiff HAS NOT previously sued the defendant's in the instant case, or in any other venue.
2. Plaintiff did sue the ASSIGNEE (Mortgage Electronic Registration Systems (MERS)), throughout the Alabama Court system and then to Supreme Court of the United States.
3. The Assignee MERS held dubious status in all those earlier proceedings for a litany of reasons, not the least of which was MERS act of purchasing subject property following present defendant declaration of McCarley default.
4. The purpose of those early lawsuits was to overturn the foreclosure (primarily on Alabama Mini-Code violations, Alabama Code Title 5-19.
5. In state court actions, McCarley mentioned and discussed RESPA violations briefly, although relying upon the Alabama Mini-Code, found at Alabama Code Title 5-19.
6. In Supreme Court of the United States writ cert., McCarley pressed a DENIAL OF DUE PROCESS charge alleging UNCONSTITUTIONAL foreclosure procedures in Alabama. Again, McCarley discussed his inability to receive (i) a trial , and, (ii) a review of evidence that would demonstrate the many defendant violations of state and federal law as the grounds underlying his charge of UNCONSTITUTIONAL foreclosure procedures.
7. Plaintiff sincerely appreciates the courts diligence in requesting the earlier court's opinion documents. We enclose those documents so that this court may see the specific details.

¹ 3:06 cv 00091 (lead case) includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), and, Household International, Inc. (00103).

Please find the following:

- Publication date of foreclosure declaration
- Result of Randolph County actions between McCarley and MERS
- Result of Court of Civil Appeals Action between McCarley and MERS
- Result of Alabama Supreme Court action between McCarley and MERS
- Result of Supreme Court of United States action between McCarley and MERS

Respectfully submitted


George D. McCarley, Pro Se
216B Chestnut Street
Roanoke, Al 36274
334-863-6489

PROOF OF SERVICE

I, George D. McCarley, do swear or affirm that on November 7, 2007, I have served the enclosed ACTION on each party to the above or that party's counsel, and on every other person required to be served, by depositing envelope containing the above documents in the United States Mail properly addressed, and with first class postage prepaid, for delivery within 3 calendar days.

The Clerk


Middle District of Alabama, Eastern Division
One Church Street, PO Box 711
Montgomery, Al 36101-0711
334-954-3600

Defendant Attorney

Mr. George Parker
Bradley Arant Rose and White
Alabama Center for Commerce
401 Adams Avenue, Suite 780
Montgomery, Al 36104
334-956-7671, 956-7700

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 7, 2007.


George D. McCarley